

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION

UNITED STATES OF AMERICA

V.

Case No. 13-CR-1712-1

ROBERT MALDONADO,

DEFENDANT

**DEFENDANT ROBERT MALDONADO'S
MOTION TO SUPPRESS ILLEGALLY SEIZED EVIDENCE**

TO THE HONORABLE RANDY CRANE:

The Defendant in the above styled and numbered cause, Robert Maldonado, under the Fourth and Sixth Amendments to the United States Constitution, respectfully moves the Court for an order suppressing evidence illegally seized from the Defendant. In support of this motion, Robert Maldonado would show the Court as follows:

I.

Defendant has been charged with the offense of Money Laundering.

On or about November 1, 2013, the government seized the following items as a result of an unlawful search:

U.S. Currency

The actions of the government violated the Defendant's rights in that:

The items were illegally seized without a warrant.

The search and seizure was conducted in bad faith.

Any tangible evidence seized in connection with this search and seizure, including but not

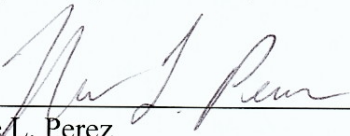
limited to the items listed above, was seized unlawfully and should be suppressed.

II.

Counsel for the Defendant conferred with Assistant United States Attorney, James Sturgis, about this motion on February 21, 2014. The government is not opposed to filing this motion.

Robert Maldonado prays that the Court enter an order suppressing the evidence listed above.

Respectfully Submitted,

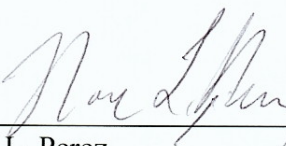


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Attorney for the Defendant,
Robert Maldonado

CERTIFICATE OF SERVICE

I certify that a true and exact copy of the Defendant Robert Maldonado's Motion to Suppress Illegally Seized Evidence was noticed by electronic filing to James Sturgis, Assistant United States Attorney on the 26th day of March, 2014.



Noe L. Perez

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DEFENDANT

**ORDER ON DEFENDANT ROBERT MALDONADO'S
MOTION TO SUPPRESS ILLEGALLY SEIZED EVIDENCE**

Defendant Robert Maldonado's Motion to Suppress Illegally Seized Evidence is hereby:

_____ GRANTED

_____ DENIED

Signed in McAllen, Texas on this the _____ day of _____
_____, 2014.

Randy Crane
United States District Judge